RENE L. VALLADARES 1 Federal Public Defender Nevada State Bar No. 11479 2 JOANNE L. DIAMOND Assistant Federal Public Defender 3 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 4 (702) 388-6577 Joanne Diamond@fd.org 5 Attorney for Jeffrey Patterson 6

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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
v.
JEFFREY PATTERSON,

Case No. 2:21-mj-00640-NJK

STIPULATION TO CONTINUE PRELIMINARY HEARING (First Request)

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and K. Nicholas Portz, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public Defender, counsel for Jeffrey Patterson, that the Preliminary Hearing currently scheduled on April 14, 2022 at 4:00 p.m., be vacated and continued to a date and time convenient to the Court, but no sooner than thirty (30) days.

This Stipulation is entered into for the following reasons:

1. The parties require additional time to discuss the potential for a Pre-Indictment negotiation.

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- 2. Counsel for the defendant will require additional time to review and investigate discovery and meet with the client to discuss the details prior to proceeding.
 - 3. Defendant is incarcerated and does not object to a continuance.
 - 4. The parties agree to the continuance.
- 5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
- 6. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

This is the first request for continuance filed herein.

DATED this 1st day of April, 2022.

RENE L. VALLADARES	CHRISTOPHER CHIOU
Federal Public Defender	Acting United States Attorney

By /s/ Joanne L. Diamond	By <u>/s/ K. Nicholas Portz</u>
JOANNE L. DIAMOND	K. NICHOLAS PORTZ
Assistant Federal Public Defender	Assistant United States Attorney

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

<u>ORDER</u>

Case No. 2:21-mj-00640-NJK

v.

JEFFREY PATTERSON,

Defendant.

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on April 14, 2022 at the hour of 4:00 p.m., be vacated and continued to May 18, 2022, at 4:00 p.m.

DATED: April 1, 2022.

UNITED STATES MAGISTRATE JUDGE